

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

FILED
02 JAN 28 PM 1:02
DISTRICT COURT OF SOUTH CAROLINA

IN RE:) Docket # 01-02200-B
)
James R. Mansfield IV)
)
)
)
SSN:407-62-6341)
SSN:)

Debtor(s))

**MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS AND TO EXPEDITE
HEARING AND MEMORANDUM**

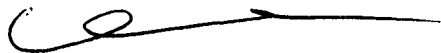
The undersigned, as attorney for the debtor hereby moves to sell property free and clear of liens. The debtor moves to sell the house and lot located at 110 Mayfield St. Summerville, SC 29485 pursuant to 11 U.S.C. § 363 and Bankruptcy Rule 6004. The debtor believes that this sale will reduce the liability to the estate and increase the chances for a successful reorganization of debt. The sale of this property will pay the first lien holder, First Union in full. The debtor agrees to wave his homestead exemption in order to increase in the available funds to pay the second lien holder, SBA.

The offer that the prospective buyer has presented is contingent on an expedient completion of this transaction. Therefore, the debtor requests to expedite a hearing on this matter.

Wherefore, debtor prays that the Court will grant this motion and allow the debtor to sell the house and lot located at 110 Mayfield St. Summerville, SC 29485 free and clear of liens.

Charleston, South Carolina

25 day of Jan, 2002.



D. Nathan Davis
Attorney for the Debtor
1124 Sam Rittenberg, Suite 8
Charleston, SC 29407
(843) 571-4042
District Court ID # 438

45
46